

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

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| IN RE: | |
| HELEN K. GAY | Chapter 13 |
| Debtor | Case No. 23-12178-PMM |
| TEACHERS FEDERAL CREDIT UNION | Ref. Dkt. Nos. 44, 56 and 57 |
| Movant | |
| v. | |
| HELEN K. GAY (Debtor) | |
| KENNETH E. WEST (Trustee) | |
| Respondents | |

CERTIFICATION OF DEFAULT

Now Comes Creditor, Teachers Federal Credit Union (“Creditor”) by and through its attorneys, Orlans PC, and files this Certification of Default to obtain an order for Relief from the Automatic Stay due to Debtor’s failure to comply with the terms of the Stipulation resolving a Motion for Relief from the Automatic Stay, and avers the following:

1. On May 22, 2024, the attached Stipulation was approved by the Court. See Exhibit “A.”
2. Debtor did not continue to make the post-petition payments as required by the Stipulation. On June 20, 2024, Creditor sent a Notice of Default to the Debtor and Debtor's Counsel, as required by the Stipulation. See Exhibit “B.”
3. Per the terms of the Stipulation, if the default is not cured within 10 days of the date of the written notice of default, Creditor may file a Certification of Default with the Court, and request for Order granting Creditor Relief from the Automatic Stay.
4. As of the date of the filing of this Certification of Default, more than 10 days have passed and the default has not been cured.

5. Creditor has not received the following payments that were due pursuant to the Stipulation attached as Exhibit "A:"

| | |
|--|------------|
| Total due per Stipulation | \$2,463.70 |
| Less payments made 3/11/2024 and 5/06/2024 | \$1,454.00 |
| Balance due per Stipulation | \$1,009.70 |

Post Stipulation payment due:

| | |
|--|------------------------|
| May 8, 2024 – July 8, 2024 regular payments @ \$694.78 each | \$2,084.34 |
| May 15, 2024 – July 15, 2024 Stipulation payment @ \$410.62 each | \$1,231.86 |
| Total | \$3,316.20 |
| Less payments made 6/21/2024 and 6/28/2024 | \$1,700.00 |
| Total post-Stipulation balance due | \$1,616.20 |
| Combined Stipulation and Post Stipulation balances | \$2,625.90 |
| Attorney fees for Notice of Default | \$ 150.00 |
| TOTAL CURRENT DEFAULT | <hr/> \$2,775.90 <hr/> |

WHEREFORE, Creditor respectfully requests this Honorable Court enter an ORDER granting Creditor Relief from the Automatic Stay.

Date: July 24, 2024

Respectfully Submitted,

/s/ Michael H. Kaliner
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